

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

INQUIRY CONCERNING SERVICE  
PERFORMANCE MEASUREMENT DATA

Docket No. PI2016-1

**MOTION OF THE UNITED STATES POSTAL SERVICE  
FOR EXTENSION OF TIME TO FILE REPLY COMMENTS**  
(January 6, 2016)

The United States Postal Service hereby moves that the Postal Regulatory Commission extend the deadline for the filing of reply comments in this docket from January 11 to February 1, 2016, for the reasons stated below.

In response to Order No. 2791 (October 29, 2015), interested parties submitted comments to the Commission on December 14, 2015, regarding potential issues related to the quality and completeness of service performance data measured by the Postal Service. Order No. 2791 established January 11, 2016 as the deadline for submission of reply comments by the Postal Service and others.

Postal Service personnel responsible for developing responses to the questions posed in Order No. 2791 and the comments filed on December 14 have worked diligently to solicit the views of subject matter experts throughout headquarters. Internal consultations on a number of substantive technical, policy and legal issues are ongoing. Critical personnel deeply involved in those consultations have been pressed in recent weeks to ensure that the Postal Service met its December 29, 2015 Annual Compliance Report filing obligations. They are now attending to critical management and litigation responsibilities unrelated to the instant docket that will dominate the next several weeks

of their time. As a result, the Postal Service now expects that it cannot conclude all necessary internal deliberations until the latter part of this month, which will allow for the submission of a comprehensive set of reply comments on or before February 1, 2016. Consequently, the Postal Service requests that the current reply comment deadline be extended to that date.

The Postal Service does not consider that any party will be prejudiced by the Commission's approval of this request. Accordingly, the Postal Service respectfully requests that this motion be granted.

Respectfully submitted,

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